

JOHN R. MANNING
Attorney at Law
1111 H Street, Suite 204
Sacramento, CA
(916)-444-3994
Fax (916)-447-0931
jmanniglaw@yahoo.com

Attorney for defendant
William Owen

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARAH ANDERSON,
FABIAN GOMEZ,
EPIFANIO RAMIREZ,
WENDY LABUDA,
WILLIAM OWEN,
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: April 3, 2023
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on April 3, 2023.
2. By this stipulation, defendants now move to continue the status conference until June 20, 2023 at 9:00 a.m., and to exclude time between April 3, 2023, and June 20, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery in this matter, consisting of over 1,300 pages of investigative reports and photographs. The government is also in the process of making available to the defense video surveillance evidence for multiple controlled drug buys as well as

1 additional discovery materials.

2 b) Counsel for defendants have met with their clients to discuss their respective
3 cases. Defense counsel desire additional time to conduct investigation into the charges, the
4 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
5 will need additional time to discuss potential resolutions with their clients, prepare pretrial
6 motions, and otherwise prepare for trial.

7 c) Counsel for defendants believe that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of April 3, 2023 to June 20, 2023,
16 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
17 because it results from a continuance granted by the Court at defendant's request on the basis of
18 the Court's finding that the ends of justice served by taking such action outweigh the best interest
19 of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 IT IS SO STIPULATED.

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25 *[Signatures continue on following page.]*
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1 Dated: March 29, 2023

/s/ DANIEL B. OLMOS

DANIEL B. OLMOS
Counsel for Defendant
SARAH ANDERSON

4 Dated: March 29, 2023

/s/ DAVID D. FISCHER

DAVID D. FISCHER
Counsel for Defendant
FABIAN GOMEZ

8 Dated: March 29, 2023

/s/ OLAF HEDBERG

OLAF HEDBERG
Counsel for Defendant
EPIFANIO RAMIREZ

11 Dated: March 29, 2023

/s/ TASHA CHALFANT

TASHA CHALFANT
Counsel for Defendant
WENDY LABUDA

15 Dated: March 29, 2023

/s/ JOHN R. MANNING

JOHN R. MANNING
Counsel for Defendant
WILLIAM OWEN

18 Dated: March 29, 2023

/s/ TAMARA SOLOMON

TAMARA SOLOMON
Counsel for Defendant
JOALEEN ROGERS

21 Dated: March 29, 2023

PHILLIP A. TALBERT
United States Attorney

/s/JAMES R. CONOLLY

JAMES R. CONOLLY
Assistant United States Attorney

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ORDER

IT IS SO FOUND AND ORDERED.

Dated: March 29, 2023



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE